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*Attorneys for Plaintiffs Gucci America, Inc.,
Balenciaga S.A., Balenciaga America, Inc.,
Bottega Veneta S.A., Bottega Veneta Inc.,
Yves Saint Laurent America, Inc.,
Luxury Goods International (L.G.I.) S.A.,
and Kering S.A.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:
GUCCI AMERICA, INC.; BALENCIAGA S.A.;	:
BALENCIAGA AMERICA, INC.; BOTTEGA	:
VENETA S.A.; BOTTEGA VENETA INC.; YVES	:
SAINT LAURENT AMERICA, INC.; LUXURY	:
GOODS INTERNATIONAL (L.G.I.) S.A.; and	:
KERING S.A.,	:
	:
Plaintiffs,	:
	:
-against-	:
	:
ALIBABA GROUP HOLDING LTD. ET AL.	:
	:
	:
Defendants.	:
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2014 Civ. 5119 (PKC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of Plaintiffs' Motion for Default Judgment, dated July 17, 2015; the Declarations of Anne M. Coyle, dated July 17, 2015, Robert Holmes, dated July 17, 2015, and Laurent Claquin, dated July 16, 2015, together with all the exhibits attached thereto; and incorporating all prior pleadings and

proceedings herein, Plaintiffs Gucci America, Inc. (“Gucci”), Balenciaga S.A. and Balenciaga America, Inc. (collectively, “Balenciaga”), Bottega Veneta S.A. and Bottega Veneta Inc. (collectively, “Bottega Veneta”), Yves Saint Laurent America, Inc. and Luxury Goods International (L.G.I.) S.A. (collectively, “YSL”), and Kering S.A. (collectively, “Plaintiffs”), by their undersigned attorneys, respectively move this Court, before the Honorable P. Kevin Castel, United States District Judge, in Courtroom 12C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, pursuant to this Court’s Order dated July 1, 2015 (ECF 32), and pursuant to Federal Rule of Civil Procedure 55(b)(2), Local Civil Rules 55.1 and 55.2 of the Local Rules of the United States District Court for the Southern District of New York, and in accordance with the Individual Practices of Judge P. Kevin Castel, for entry of a default judgment against Defendants Hangzhou Yanbei Trading Co., Ltd., Yiwu Bothwiner Fashion Accessory Co., Ltd., Guangzhou Yongxing Leather Goods Mfg., Dongguan Huawang Leather Co., Ltd., Shen Zhen Aiers Watch Co., Ltd., Shenzhen Meigeer Watch Co., Ltd., Shenzhen Babylon Watch Co., Ltd., VANCS Where Boutique, Celebrity Shoe, Jinlong Luxury City, Gucci Fashion Shop, Ladylidy Shop, Coco Fashion Style, Huiming Leather Mall, Hong Kong Longitude and Latitude International Trading, Fashion Zone Ltd., and Star Factory (collectively, the “Merchant Defendants”),¹ containing equitable and monetary relief in substantially the form of the attached Proposed Default Judgment, and for such other relief as is just and proper.

¹ Plaintiffs submit herewith a voluntary dismissal of all claims against Defendants “Spring Rain Leather Goods” and “Xiaohui Jin’s Store.”

Dated: New York, New York
July 17, 2015

Respectfully submitted,

GIBSON, DUNN & CRUTCHER, LLP

By: s/ Robert L. Weigel

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